

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION**

**UNITED STATES OF AMERICA**

**VS.**

**RICARDO QUINTANILLA, et. al.**

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**Case No. 7:19-cr-00522**

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**DEFENDANT QUINTANILLA'S MOTION TO ADOPT AND/OR ADAPT  
APPLICABLE MOTIONS OF CO-DEFENDANTS**

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TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendant Ricardo Quintanilla, by and through the undersigned counsel, and respectfully moves to adopt and/or adapt and have the benefit of applicable motions filed by any co-defendant indicted in the above-styled action. As grounds for this motion, Defendant Quintanilla states as follows:

Defendant Quintanilla is charged in this case along with four co-defendants. Counsel for Defendant Quintanilla is aware that counsel for the co-defendants have and will file motions that may be applicable to Defendant Quintanilla.

To reduce the burden on this Court and with respect to repetitive pleadings, Defendant Quintanilla desires to adopt and/or adapt all applicable motions made by his co-defendants, not inconsistent with Defendant Quintanilla's position. Defendant Quintanilla will conform them, if necessary, and, if appropriate, will add supplemental memoranda of authority in support thereof.

Due to the complexity of this case and the nature of the charges and indictment, the above relief is necessary in the interest of justice, for due process of law, and for effective assistance of counsel.

WHEREFORE, PREMISES CONSIDERED, Defendant Quintanilla prays the Court grant this motion and allow him to adopt and/or adapt the applicable motions made by his co-defendants.

Date: June 21, 2021

Respectfully submitted,

PEÑA ALECZANDER  
3900 N. 10th Street, Suite 1050  
McAllen, Texas 78501  
Phone: (956) 948-2221  
Fax: (888) 422-6821

By: /s/ Michael Saldaña  
Michael Saldaña  
State Bar No. 24115291  
Federal ID No. 3502765  
msaldana@penaaleczander.com

Jaime Peña  
State Bar No. 90001988  
Federal ID No. 289815  
jpena@penaaleczander.com

Robert Casas Steindel  
3827 N. 10th Street, Suite 302  
McAllen, Texas 78501  
Phone (956) 800-1137  
Fax (956) 800-1138  
rsteindel96@gmail.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

This is to certify that prior to the filing of the foregoing motion the undersigned defense counsel conferred with counsel for the Government regarding this motion. The Government is opposed to the motion.

By: /s/ Jaime Peña  
Jaime Peña

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was filed by CMECF and served on all counsel of record.

By: /s/ Michael Saldana  
Michael Saldana

ATTORNEY FOR DEFENDANT